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JAMES MURRAY
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
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13 UNITED STATES OF AMERICA,
14 Plaintiff,

15 vs.

16 JAMES MURRAY,
17 Defendant.
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Case No. CR 12-0278 EMC

STIPULATION AND [PROPOSED]
ORDER FOR TEMPORARY RELIEF
CONCERNING ARREARAGE AT
HALFWAY HOUSE

20 Plaintiff UNITED STATES OF AMERICA and Defendant JAMES MURRAY,
21 through their undersigned counsel, and UNITED STATES PRETRIAL SERVICES,
22 through its Deputy Chief, HEREBY STIPULATE, as follows:

23 1. WHEREAS following his release to the halfway house on July 19, 2013,
24 Defendant's brother paid for most of Defendant's stay for July and August, 2013 but has
25 not yet paid for September 2013;

26 2. WHEREAS Defendant is in arrears to the halfway house and, because of the
27 arrearage, is in imminent danger of eviction;
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3. WHEREAS Defendant was found eligible for appointed counsel on April 29, 2013 (Dkt. 107), and in or about mid-August 2013, federal funding for alternatives to detention for indigent defendants became available;

4. WHEREAS Pretrial Services has asked that Defendant seek at least partial contribution from Defendant's family to cover the cost of the halfway house;

5. WHEREAS the parties agree that Pretrial Services will pay the halfway house all amounts in arrears for Defendant to prevent Defendant from being evicted;

6. WHEREAS the parties do not waive any objections or arguments they may have concerning the respective obligations of the Court, Pretrial Services, Defendant and his family members to pay for the halfway house;

THEREFORE, Pretrial Services, Defendant and the government respectfully request that the Court temporarily modify Defendant's bond conditions to permit Pretrial Services to pay to Geo Care, LLC the amount necessary to cover the arrearage for Defendant's stay at the halfway house and for the cost of future expenses, until further order of the Court.

Dated: September 30, 2013

**PILLSBURY WINTHROP SHAW
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MARC H. AXELBAUM
Four Embarcadero Center, 22nd Floor
San Francisco, CA 94111**

By /s/ Marc H. Axelbaum
Attorneys for Defendant JAMES
MURRAY

Dated: September 30, 2013

SILVIO LUGO
California Northern Pretrial Services
450 Golden Gate Avenue
San Francisco, CA 94102

By /s/ Silvio Lugo
 Silvio Lugo
 Deputy Chief, U.S. Pretrial Services Officer

1 Dated: September 30, 2013

MELINDA HAAG
United States Attorney
450 Golden Gate Avenue
San Francisco, CA 94102

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By /s/ Robin L. Harris
Robin L. Harris
Assistant United States Attorney

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7 **ATTESTATION:** Pursuant to General Order 45, Part X-B, the filer attests that concurrence
8 in the filing of this document has been obtained from each of the signatories.

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[PROPOSED] ORDER

Based on the foregoing Stipulation, the Court temporarily modifies Defendant's bond conditions to permit Pretrial Services to pay to Geo Care, LLC the amount necessary to cover the arrearage for Defendant's stay at the halfway house and for the cost of future expenses, until further order of the Court. All prior orders concerning Defendant's release conditions remain in effect until further order of the Court.

IT IS SO ORDERED.
October 3

Dated: ~~September~~, 2013

